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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

ELIZABETH ANN DE LA TORRE,)	Case No.: 1:21-cv-01002-SKO
)	
Plaintiff,)	STIPULATION AND ORDER FOR AN
)	EXTENSION OF TIME
vs.)	
)	(Doc. 22)
KILOLO KIJAKAZI, Acting Commissioner of)	
Social Security,)	
)	
Defendant.)	

Pending the Court's approval, the time for Defendant to file her Motion for Summary Judgment is extended thirty-five (35) days from January 26, 2023, up to and including March 2, 2023. This is the Defendant's first request for an extension on the deadline to file her Motion for Summary Judgment.

Defendant respectfully request this extension due to extensive workload issues. For example, Counsel is currently responsible for drafting dispositive briefs in 22 Federal District Court cases between January 23, 2023 and February 27, 2023. Counsel appreciates Plaintiff's Counsel's professional courtesy and apologizes to the Court for the inconvenience.

1 The parties further stipulate that the Court's Scheduling Order shall be modified
2 accordingly.

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4 Respectfully submitted,

5 Dated: January 25, 2023

PHILLIP A. TALBERT
United States Attorney

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8 By /s/ Marla K. Letellier
MARLA K. LETELLIER
9 Special Assistant U.S. Attorney
10 Attorneys for Defendant

11 Dated: January 25, 2023

PENA & BROMBERG

12 By /s/ Jonathan Pena*
13 (*as authorized via e-mail on January 25, 2023)
JONATHAN PENA
14 Attorney for Plaintiff

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16
17 **ORDER**

18 Pursuant to the parties' foregoing stipulation (Doc. 22), and for good cause shown,

19 IT IS ORDERED that Defendant shall have an extension, up to and including March 2,
20 2023, to file Defendant's Motion for Summary Judgment. All remaining deadlines in the
21 Scheduling Order (Doc. 11) are extended accordingly.

22
23 IT IS SO ORDERED.

24 Dated: **January 26, 2023**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE